

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Misc. No. \_\_\_\_\_**

In re:

Stream TV Networks, Inc.,<sup>1</sup>

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and  
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS VI,  
LLC, HAWK INVESTMENT HOLDINGS  
LIMITED, ARTHUR LEONARD ROBERT "BOB"  
MORTON, SEECUBIC, INC., ALASTAIR  
CRAWFORD, KRZYSZTOF KABACINSKI,  
KEVIN GOLLOP, ASAF GOLA, JOHN DOE(S),  
JANE DOE(S), DELAWARE and OTHER LAW  
FIRMS representing and acting in concert with John  
Doe(s) and/or Jane Doe(s), INVESTMENT BANKS  
employed by John Doe(s) and/or Jane Doe(s),  
PATRIC THEUNE, and SEECUBIC B.V.,  
Defendants.

Adv. No. 23-00057

**NOTICE OF MOTION  
OF DEBTORS FOR WITHDRAWAL OF REFERENCE**

**PLEASE TAKE NOTICE** that on August 30, 2023, Stream TV Networks, Inc.

<sup>1</sup> The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

("Stream") and Technovative Media, Inc. (Technovative" and collectively with Stream, the "Plaintiffs" or "Debtors"), moved pursuant to title 28 U.S.C. §157(d), Bankruptcy Rule 5011, and Eastern District of Pennsylvania Local Bankruptcy Rule 5011-1, for an order withdrawing the reference to the United States Bankruptcy Court for the Eastern District of Pennsylvania ("Motion").

**PLEASE TAKE FURTHER NOTICE** that your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief sought in the above referenced Motion or if you want the Court to consider your view on the Motion, then on or before September 13, 2023<sup>2</sup> you or your attorney must file a response to the Motion (See Instructions on next page).

**PLEASE TAKE FURTHER NOTICE** that you may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice. Copies of the Motion referenced above may be inspected in the Office of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Bankruptcy Court's website at [www.paeb.uscourts.gov](http://www.paeb.uscourts.gov). Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents through the Bankruptcy Court's website. Parties in interest may sign up for a PACER account by visiting the PACER website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856. Additionally,

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<sup>2</sup> September 13, 2023 is fourteen (14) days from service of this pleading.

copies of the Motion are available on the website maintained by the Debtor's claims and noticing agent BMC Group at <https://cases.creditorinfo.com/streamtvnetworks>. Requests for copies of the Motion and further information regarding the hearing may also be made to counsel for the Debtor at the telephone number and address listed below.

**Filing Instructions**

**PLEASE TAKE FURTHER NOTICE** that if you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically. If you are not required to file electronically, you must file your response at: United States Bankruptcy Court Eastern District of Pennsylvania Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Suite 400 Philadelphia, PA 19107

**PLEASE TAKE FURTHER NOTICE** that if you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 3 on the previous page of this Notice. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney at the undersigned.

**PLEASE TAKE FURTHER NOTICE** that oral argument is hereby requested if timely opposition is filed for the Motion.

Dated: August 30, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)

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*Counsel to the Debtors*